

Benefits of a Low Threat UST Closure Policy and Related Improvement Efforts

CORE Environmental Foundation, Inc.

A non-profit organization focused on UST Issues

Who is CORE Environmental?

- Founded during USTCF financial crisis in 2009
- Created to represent a coalition of Consultants, Owner/operators , Regulators, and Enviro-vendors
- Meets regularly with USTCF to maintain communication
- CORE identified future need for additional USTCF funding and sponsored AB291 to extend 2 cent/gal fee (bipartisan support with AB358)
- Working with stakeholders for *legislative* and *administrative* solutions on key UST issues for the present and future
- Looking for more members, partners, and contributions to continue important work on behalf of industry, owners, government and public

Benefits of a Low Threat Policy

- Additional policy and/or guidance can provide greater clarity on UST case closure criteria *statewide*
- Expedite case closure at low threat sites
- Control cleanup cost at lower risk sites
- Help focus limited resources for cleanup on more impacted sites
- An example of Good Government

Recommendations for LTC Policy

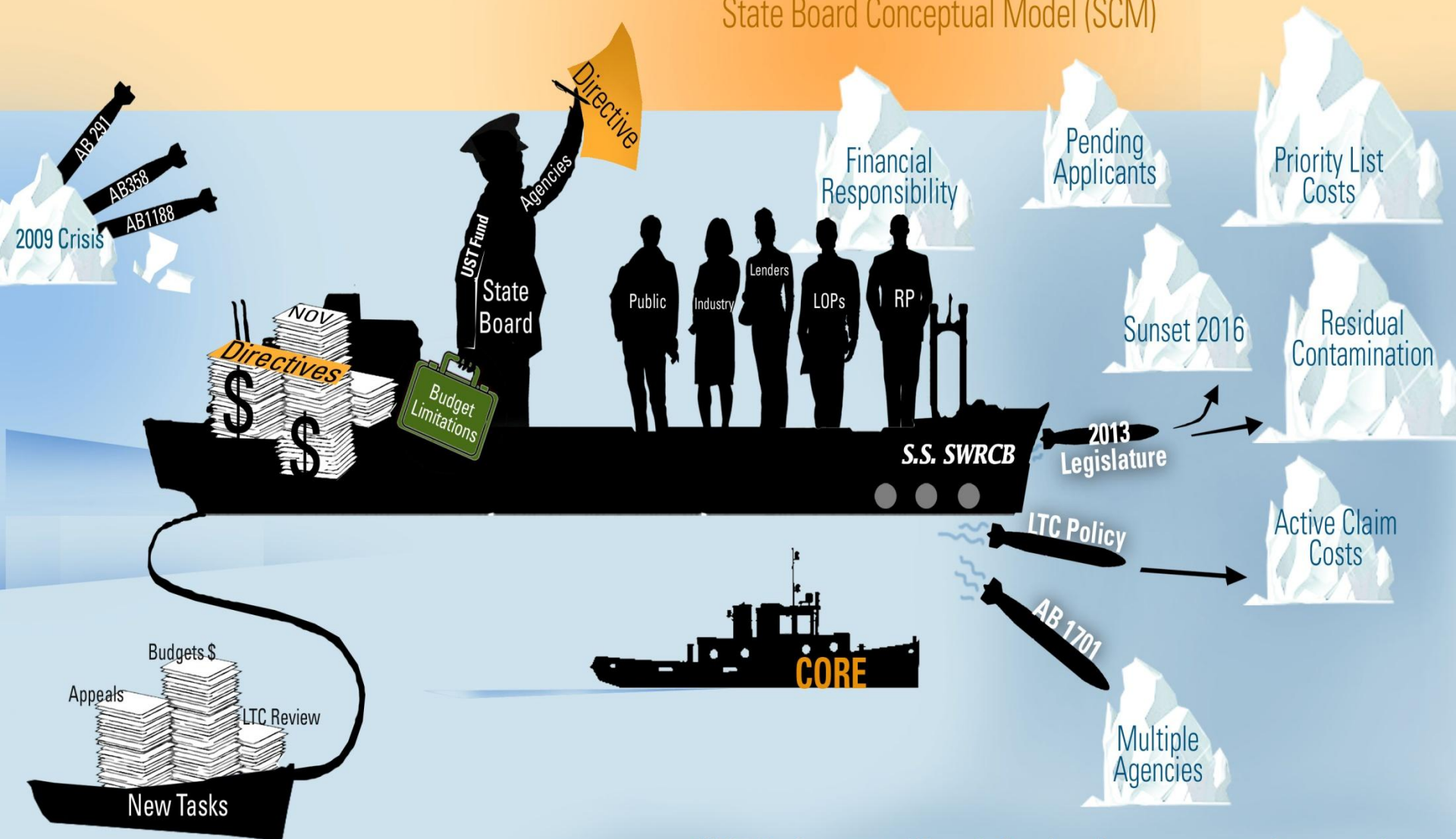
- Consider comments provided by public
- Ensure soundness of science behind policy
- Maintain transparency throughout adoption of policy
- Minimize any negative effects of residual contamination for claimants, property owners and UST operators/businesses:
 - Potential case re-opening during future property transactions or new information
 - Resumed access to USTCF reimbursement if case re-opened
 - Cost to handle residual contamination before and after closure (Vapor barriers? Future soil disposal? Future assessment costs during transactions?)
 - Lender concerns during transactions and refinancing (fewer loans? Higher interest rates?)
 - Property devaluation
 - Deed Restrictions remain optional
- Revise USTCF and UST Program to minimize potential negative effects of policy

Related CORE Efforts

- Actively working with stakeholders for ***administrative*** solutions on key UST issues
 - Improve new USTCF budget process procedures, speed, and effectiveness
 - Improve interaction between USTCF and oversight agencies, especially regarding budget limitations and agency directives
 - Enhance appeal processing for case closure petitions and ineligible cost determination. r the present and future
- Actively working with stakeholders for ***legislative*** solutions
 - Extend Sunset from 1/1/2016 to 1/1/2021 when appropriate to ensure demonstration of financial responsibility
 - Maintain 2 cent/gal fee or increase/decrease fee to meet USTCF needs
 - Provide additional resources to USTCF if beneficial for cost control and oversight
 - Improve ability to issue LOCs to new applicants and Priority List backlogged claims.

CORE Helping Nagivate New Waters

State Board Conceptual Model (SCM)



To Join CORE or Contribute:

www.coreenvironmental.org

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Consultants, Owners, Regulators and Enviro-venders